IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

PARITY NETWORKS, LLC,

Plaintiff,

S
Civil Action No. 6:17-cv-00495-RWS

V.

S
JURY TRIAL DEMANDED

JUNIPER NETWORKS, INC.,

Defendant.

S

Defendant.

UNOPPOSED MOTION TO FILE UNDER SEAL

Plaintiff Parity Networks, LLC ("Parity"), by its undersigned counsel hereby moves this Court to order Exhibits C and D to Parity's Motion to Compel Defendant Juniper Networks, Inc. to Respond to Interrogatories to be filed under seal. Exhibits C and D are Juniper's interrogatory responses which were produced subject to a CONFIDENTIAL designation pursuant to the Protective Order in the case. As grounds for this motion, Plaintiff states as follows:

- 1. Defendant Juniper Networks, Inc.'s Objections and Responses to "Plaintiff's First Set of Common Interrogatories to Defendants," Exhibit C to the Motion to Compel, was designated CONFIDENTIAL by Juniper.
- 2. Defendant Juniper Networks, Inc.'s Objections and Responses to "Plaintiff's First Set of Specific Interrogatories to Defendant Juniper Networks, Inc.," Exhibit D to the Motion to Compel, was designated CONFIDENTIAL by Juniper.
- 3. Parity therefore respectfully requests that this Court order Exhibits C and D to Parity's Motion to Compel be filed under seal.

Dated: June 29, 2018 Respectfully submitted,

/s/ Andrew G. DiNovo_

Andrew G. DiNovo
Texas State Bar No. 00790594
adinovo@dinovoprice.com
Adam G. Price
Texas State Bar No. 24027750
aprice@dinovoprice.com
Daniel L. Schmid
Texas State Bar No. 24093118
dschmid@dinovoprice.com
DINOVO PRICE LLP

7000 N. MoPac Expressway, Suite 350

Austin, Texas 78731

Telephone: (512) 539-2626 Telecopier: (512) 539-2627

COUNSEL FOR PLAINTIFF PARITY NETWORKS, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that on the 29th day of June 2018, I conferred via email with Brandon Stroy, counsel for Defendant Juniper Networks, Inc., and confirmed that this Motion is unopposed.

/s/ Andrew G. DiNovo
Andrew G. DiNovo

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of June 2018, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Andrew G. DiNovo
Andrew G. DiNovo